

EXHIBIT 13

Nadine Lee Deposition
Supplemental Pages

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No. 1:18-cv-1046

HUI MINN LEE,

Plaintiff,

-vs-

MARKET AMERICA, INC.,

Defendant.

December 4, 2020

9:37 a.m.

- - - - -

DEPOSITION

TAKEN VIA VIDEO TELECONFERENCE

OF

HUI MINN LEE

- - - - -

1 7th, I believe. And then I have a consequential
2 conversation with her on 12th.

3 Q Did you record your conversation with Sherry
4 Spesock on the 7th of December of 2016?

5 A No, I did not.

6 Q Why not?

7 A Because that's just a -- well, I didn't see
8 -- think there's a very, very serious issue that I
9 need to recall it.

10 Q Tell me about your conversation then on
11 December 7th, 2016, with Sherry Spesock. Why did you
12 initiate that conversation with Sherry?

13 A Because I was on my P -- PTO. I went in for
14 meeting early in the morning. And, I believe, after
15 the meeting Liliana called me to her office. That's
16 the first time I knew that she was moving into that
17 office. And she told me she is my boss from now on
18 because the original arrangement was after Colbert
19 left, all of us that report to Colbert were report to
20 Sherry. And when I come back, that's what I
21 understand. And Colbert specific tell us, oh, this is
22 the arrangement when she left. And then that day, I
23 -- I went into the office and being called by Liliana
24 into Colbert's office and informed this change, so I
25 didn't say anything. I -- and she start talking about

1 one of my job responsibility. And she say she doesn't
2 like that. She want me to share that with Henri. I
3 didn't say much about it at the time because she just
4 inform me that she was my boss. And I did not hear
5 from anybody else, so I went to talk to Sherry and
6 just to confirm if this is what happened. And why am
7 I being demoted again since we were all report to
8 Colbert when she left. Now I'm being demoted again
9 under Liliana. And she say that, yes, this is what
10 happened. Marc decide that. And I share my concern.
11 I say why is that because my two -- well, it's,
12 basically, the same conversation with Colbert.

13 Q Did your pay change when you started to
14 report to Liliana?

15 A Did my what change?

16 Q Did your -- did your money -- your income --
17 change when you started to report to Liliana?

18 A No.

19 Q Did your title change when you started to
20 report to Liliana as your manager?

21 A No.

22 Q Why did you -- did someone tell you that it
23 was a demotion to report to Liliana?

24 A Well, to me it was because, you know, when
25 you report to a -- a director and now you do -- you

1 evaluation is Liliana, so I don't know who did that.

2 Q The recording we have, is that the complete
3 conversation between you and Sherry Spesock from
4 December 12, 2016?

5 A I believe so.

6 Q It's mentioned in -- I -- in, I think,
7 several places that Sherry Spesock made a comment, if
8 Spesock could survive a hostile environment, so could
9 you. Did that come from this conversation, on
10 December 12, 2016, with Sherry?

11 A Yes.

12 Q Okay. So is it -- so it's within the
13 recording where she talks about Marty; is that right?

14 A Correct.

15 Q Okay. All right. That specific comment --

16 A That's my take away.

17 Q Okay. So -- so the comment if Spesock could
18 survive a hostile environment, so could you is your
19 take away from your recorded conversation with Sherry
20 Spesock on December 12th?

21 A And -- and she constantly tell me this
22 should work out this will work out, this will work
23 out.

24 Q Okay. I -- I just wanted to make -- I just
25 wanted to know where that kind of comment that I saw